

Warren

From: Warren [warren@warren.com]
Sent: Tuesday, February 24, 2009 3:23 AM
To: 'support@leadnetworks.com'
Subject: whois accuracy of data

The data for these following names is not correct and needs to be corrected:

reabok.com
daffy.com
remolacha.com
pirreli.com
satz.com
varizon.com
vierzon.com
validas.com
redroof.org
profesia.com
livs.com
oncologics.com
fivebars.com
gunit.com
mascaron.com
belis.com
sunlet.com
helmsley.com
epsun.com
vespas.com
zire.com
viao.com
condensate.com
sonystyles.com

Warren Weitzman
IDC
warren@warren.com
(GMT -5)
+1 301-980-1111
fax +1 801-760-1111

Warren

From: Worldwide Registration Bureau [mailto:mail@world-ip.net]
Sent: Friday, March 13, 2009 9:29 AM
To: 'Warren'; 'Stevan Lieberman'; 'Arnold Trebach'
Subject: RE: INTA 2009

Dear Warren,

Thank you for your e-mail below. I verified this information from the WHOIS records and found the physical address of Lead Networks. They are located at:

B-304, Florida, Y - 11,
Shastri Nagar, Lokhandwala Complex,
Andheri (W)
Mumbai
Maharashtra, 400053

Also checked up the status of few of your domains at the WHOIS, for instance ZIRE, VESPAS and a few more. The status was shown as locked but even the administrative, technical and billing contact details had address of M/s. Lead Networks only. I believe the Registrant details have been kept private but the attempt is for sure to hijack these domains. I also appreciate that your concern for the moment is domains, other than **varizon.com** and **vierzon.com**, which as you said are quite willing to forgo and even transfer to Verizon Communications if that be the case. For the rest of the domains, we can surely help you out and try to recover these domains from Lead Networks.

As I see, there are three ways to do the job:

- a) We send a legal notice to Leadnetworks in strict legal terms, asking them to unlock the domains which are not in dispute, so that you could move them to a Registrar of your choice. (My preferred option)
- b) Before serving them a legal notice, we try and contact them, maybe even ask one of our Associate in Mumbai to personally go and verify the details of this company, and then ask them to settle this issue peacefully. I appreciate they have not been responding to your requests but after knowing that you have contacted us and would take legal recourse if domains are not unlocked, they might shift their stand (or, they may not).
- c) We file a suit (case/petition) against Leadnetworks, either in Delhi or in Mumbai (we'll have to work out the jurisdictional aspect) and get an order of mandatory injunction from the Court asking them to unlock the domains. We'll try and at least get a limited protection on day 1, the defendant Lead Network being ex-parte, that they will not divulge with these domains or make any fraudulent transfer till the rights are determined in the suit.

If you could provide me some more information about the **varizon.com** and **vierzon.com** dispute that occurred, it might help me even further to make out a case.

Gaurav Miglani
Partner

WRB | WORLDWIDE REGISTRATION BUREAU
Intellectual Property ~ Prosecution ~ Litigation

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INDIA

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mail@world-ip.net; ipindia@gmail.com

From: Warren [<mailto:warren@warren.com>]
Sent: Friday, March 13, 2009 3:16 AM
To: 'Stevan Lieberman'; 'Arnold Trebach'; 'Worldwide Registration Bureau'
Subject: RE: INTA 2009

Gaurav,
Below are the domains that are locked and are not in any dispute, either in India or anywhere else that we are aware of. They are simply locked for the purpose of Lead Networks gaining control and ownership, or basically, hijacking them. The account is in my name, Warren Weitzman, with the login of warren@warren.com The contact information for Lead Networks is: www.leadnetworks.com and their support email is support@leadnetworks.com, phone and contact info below:
Sales Contact:
Email Address: sales@leadnetworks.com
Tel: +91.2226313093
Fax: +91.2226313094

Although I've never gotten a response from email or voicemail. The only contact I've been able to make is directly to the owner and person who promised me good faith and safety in the domain transfers to Lead Networks, someone name 'Nick'. I have been able to reach him by cellphone at: +971507071720 His latest story is that he in Dubai and does not work at Lead Networks. Mr. Lieberman firmly believes that this is false and that he is the owner/manager of Lead Networks and probably isn't in Dubai, but in hiding.

Also, just tried again to login and noticed that their site, www.leadnetworks.com is non-operational and goes to a general 'landing page'. Perhaps this is the first step in diverting ownership and theft of our domains.

The two domains that are currently being discussed by Mr. Lieberman are varizon.com and vierzon.com. We have no problem releasing these names, letting them expire, or transferring them to Verizon Communications. The remaining domains have considerable value to us. Many of these I've held since 1995 at various registrars; NSI, then Enom.com and finally transferred to Lead Networks.

The domains currently in our account are as follows:

sonystyles.com
condenaste.com

viao.com
zire.com
daffy.com
reabok.com
vespas.com
pirreli.com
epsun.com
helmsley.com
satz.com
sunlet.com
belis.com
mascaron.com
gunit.com
fivebars.com
oncologics.com
livs.com
garum.com
profesia.com
redroof.org
validas.com
pirreli.com
remolacha.com
varizon.com
vierzon.com

Thank you very much for your assistance in this matter. Our goal, I'm sure all will agree, is to gain control over our domains and to transfer them out of Lead Networks and into a registrar that is in good standing with ICANN and will allow our management of the names.

I have hopes that you can prevent the hijack and/or fraudulent transfer of these domains.

Best regards,

Warren Weitzman

From: Stevan Lieberman [mailto:stevan@APLegal.com]
Sent: Thursday, March 12, 2009 2:50 PM
To: Arnold Trebach; Worldwide Registration Bureau
Cc: Warren
Subject: RE: INTA 2009

April 18, 2009

ICANN

William Andrew McKelligott
International Square
1875 I (EYE) Street, NW, Suite 501
Washington DC, 20006

URGENT REQUEST FOR HELP IN DISSOLVING A REGISTER LOCK ON 24 NAMES

(corrected to 23 domain names)

Sent via Email (3 folders) and hardcopy

Dear Mr. McKelligott:

As requested, I have put together the exhibits to claim ownership and regain control of these domains currently at Lead Networks in India.

Unfortunately, I have no denied transfer requests as I am currently locked out of the account and cannot get an EPP code to authorize a transfer. All of the domains are in an account held in the username: warren@warren.com at Lead Networks.

For information on the Verizon settlement, varizon.com, vierzon.com please let me know what you need. If you would like direct information on this, it might be best if we brought my attorney, Stevan Lieberman (stevan@aplegal.com) into the conversation. He can confirm that the Verizon domains have been settled and that they were never in use.

I have been working with domains since 1994 or so, and as you may know, when one has 12,000+ domains, it's difficult not to have a few that overlap on others trademarks. The Verizon domains are an example of this and there are a few others on the list that fall into that category as well. None of these are in dispute and I have not been contacted by any complainant for any of the domains other than the Verizon misspells. I think that this is important only because it reflects on my reputation and credibility. If any business were to request or complain about an infringement, I would surely surrender and transfer the domain to them, should it be a legitimate claim.

Attached are items that I hope are helpful in proving ownership and my claim of theft or hijacking of the domains. The unauthorized lock and change in DNS should demonstrate the theft, as the domains are now parked at ns1.fastpark.net, with whom I

have no affiliation. Evidently, Lead Networks is profiting from the traffic on these domains.

I have included in the attachments, as exhibits, the following:

Exhibit 1: Original registration information, including renewals and dns and domain history from 'domaintools.com'. These are arranged alphabetically for:

belis.com

condenaste.com

daffy.com

epsun.com

fivebars.com

gunit.com

helmsley.com

livs.com

mascaron.com

oncologics.com

pirreli.com

pirreli.com

profesia.com

reabok.com

redroof.org

remolacha.com

satz.com

sonystyles.com

sunlet.com

validas.com

vespas.com

viao.com

zire.com

Exhibit 2:

Information on the Indian registrar, Lead Networks. The original filing by Verizon Communications against 'Nick' and Lead Networks.

Exhibit 3:

Some communications from my attorneys in India. There may be some contact information here that is helpful and another legal approach. Hopefully, it won't come to that.

Thank you very much to take the time to examine my complaint and to assist me in this very unpleasant situation. I look forward to speaking with you when you are back in the DC office.

Best regards,

Warren Weitzman

301-980-1111

warren@warren.com